

### **REMARKS**

Claims 1-35 and 107-110 have been canceled. Claims 36-106 are now pending in the application, of which claims 44-100 and 102-106 have been withdrawn from consideration. Applicants amend claims 36 and 101 for further clarification, referring to Fig. 1 and its corresponding description in the specification for an exemplary embodiment of and support for the claimed invention. No new matter has been added.

Claims 36, 41-43, and 101 stand rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 5,875,231 to Farfan et al.; claim 37 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Farfan et al. in view of U.S. Patent No. 5,577,111 to Iida et al.; and claims 38-40 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Farfan et al. in view of U.S. Patent No. 5,692,033 to Farris. Applicants respectfully traverse the rejections.

The Examiner cited elements "1303" and "50" from Fig. 13 of Farfan et al. as alleged disclosure of a computer telephony integration client unit and a computer telephony integration server unit, respectively. Page 3, lines 5-8 of the Office Action. While Farfan et al. do not appear to disclose any element "50," col. 7, lines 2-16 thereof cited by the Examiner includes description of a "voice server 1302." But Farfan et al. only describe such a voice server 1302 as an entity on the communications path of a call:

"In such an arrangement, known as computer telephony integration (CTI), calls come into PBX 1301 and go to Voice Server 1302, which contacts the subscriber via LAN 1304 and PC 1303. Using his keyboard 5 or mouse, the subscriber tells PC 1303 to tell Voice Server 1302 to tell PBX 1301 how to handle the call, e.g., answer the call, take a message, put the call on hold, etc. In such an arrangement holder-on-hold software and associated ESP cards, e.g., Dialogic, etc., could be added to the PC to allow 10 the PC to operate as the ESP. Another alternative embodiment would be to implement the holder-on-hold service within the CO switching system or other telecommunications network element.

Thus, the ESP and holder-on-hold software could be implemented at various points in the telecommunications network to provide the features claimed 15 in the present invention." Col. 7, lines 2-16 of Farfan et al. (Emphasis added)

And correspondingly, Farfan et al. only describe implementing "holder-on-hold" functionality on "various points in the telecommunications network"—i.e., on the communications path of a call:

"Referring now to FIG. 1, telephone 101 is used by Party A to connect to telephone 102 which is used by Party B. The connection between telephone 101 and telephone 102 is via public switching network 103 and central office switch 104. If, however, Party A were connected to central office switch 104, then there would be no need for the call to be placed through the public switching network 103 but rather Party A would be connected to Party B via central office switch 104 only.

Once Party A places Party B on hold, and central office switch 104 maintains that hold connection, Party B can access the holder-on-hold service by utilizing the transfer function or hook switch flash. Central office switch 104 responds to the hook switch flash generated by the hook switch or transfer button by transferring the call to enhanced services platform 105 and the holder-on-hold software implemented thereon. Party B can then hang up the telephone and the call is then maintained by central office switch 104 and enhanced services platform 105.

When Party A returns to the call the connection to the call is maintained by telephone 101 rather than central office switch 104, and the holder-on-hold software rings Party B's 45 telephone 102, via central office switch 104, to inform him that Party A has returned to the call. Once Party B answers the call the holder-on-hold software causes Party B's telephone 102 to be connected to Party A's telephone 101 by switching the call through a network in enhanced services 50 platform 105. The call path then extends from telephone 101, through central office switch 104, through the network of enhanced services platform 105, back through central office switch 104, and then to Party B's telephone 102." Col. 2, lines 22-53 of Farfan et al. (Emphasis added)

Thus, Farfan et al., as cited and relied upon by the Examiner, fail to disclose,

"[a] computer telephony integration client unit for transmitting computer telephony integration control request

information for use in requesting computer telephony integration control to a computer telephony integration server unit, comprising:

computer telephony integration control request information editing means for editing the computer telephony integration control request information; and

communications control means for communicating with the computer telephony integration server unit through a computer network the computer telephony integration control request information and information relating to the computer telephony integration control request information for controlling communications, through a communications network, between a first telephony device associated with the computer telephony integration client unit and a second telephony device associated with the computer telephony integration server unit," as recited in claim 36. (Emphasis added)

Accordingly, Applicants respectfully submit that claim 36, together with claims 41-43 dependent therefrom, is patentable over Farfan et al. for at least the above-stated reasons. Claim 101 incorporates features that correspond to those of claim 36 cited above, and is, therefore, patentable over Farfan et al. for at least the same reasons.

The Examiner cited Iida et al. and Farris as combining references to respectively address the additional features recited in claims 37-40, which depend from claim 36. As such, combinations with these references would still have failed to cure the above-described deficiencies of Farfan et al. in connection with claim 36. And thus, Applicants respectfully submit that claims 37-40, dependent from claim 36, are patentable over the cited references for at least the above-stated reasons.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

/Dexter T. Chang/

Dexter T. Chang

Reg. No. 44,071

CUSTOMER NUMBER 026304

Telephone: (212) 940-6384

Fax: (212) 940-8986 or 8987

Docket No.: 100794-00578 (FUJO 14.947A)

DTC:tb